

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL JOHN BATT,

Defendant.

INDICTMENT

_____/

The Grand Jury charges:

COUNT 1

(Sexual Exploitation and Attempted Sexual Exploitation of a Child)

On or about September 19, 2022, in Ottawa County, in the Southern Division of
the Western District of Michigan,

MICHAEL JOHN BATT

knowingly used and attempted to use a minor to engage in sexually explicit conduct for
the purpose of producing any visual depiction of such conduct, and such visual depiction
was produced using materials that had been mailed, shipped, and transported in and
affecting interstate and foreign commerce and transmitted using any means or facility of
interstate or foreign commerce or in or affecting interstate or foreign commerce.

Specifically, the defendant used and attempted to use Child 1, who was
approximately three years old, to engage in the lascivious exhibition of Child 1's genitals
or pubic area for the purpose of taking photographs of the conduct. The defendant

created the images using an Apple iPhone, which was manufactured in China, and transmitted the images using an internet-based messaging application.

18 U.S.C. § 2251(a) and (e)

18 U.S.C. § 2256(8)(A)

COUNT 2
(Distribution of Child Pornography)

On or about September 20, 2022, in Ottawa County, in the Southern Division of the Western District of Michigan, and elsewhere,

MICHAEL JOHN BATT

knowingly distributed child pornography using any means or facility of interstate or foreign commerce. Specifically, the defendant distributed one or more of the following images of child pornography through an internet-based messaging application:

1. 93AC18C2-690C-4737-B224-45746DAD6C8E.jpeg
2. 4FA535E1-C8CB-46A3-A74A-2BCF5753AA0A.jpeg
3. 998415F3-ABFF-48E1-A42B-5188EF7B2948.jpeg
4. BC0F1C10-1DC8-4FAB-8EC3-CDE2CFE21B28.jpeg

18 U.S.C. § 2252A(a)(2)(A) and (b)(1)

18 U.S.C. § 2256(8)(A)

FORFEITURE ALLEGATION

The allegations contained in Counts 1 and 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253. Pursuant to 18 U.S.C. § 2253(a), upon conviction of an offense in violation of 18 U.S.C. §§ 2251 or 2252A,

MICHAEL JOHN BATT

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. §§ 2251 or 2252A; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, and received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses or any property traceable to such property. The property to be forfeited, as to all counts, includes, but is not limited to, an Apple iPhone 12 Pro, IMEI No. 350522076471100, that was seized from the defendant's residence on September 20, 2022.

18 U.S.C. § 2253

18 U.S.C. § 2251

18 U.S.C. § 2252A

18 U.S.C. § 2256(8)(A)

21 U.S.C. § 853

28 U.S.C. § 2461(c)

A TRUE BILL

A handwritten signature in blue ink, consisting of a large, stylized 'S' shape with a horizontal line extending to the right.

GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney

A handwritten signature in blue ink, featuring a large, stylized 'P' and 'C' with a horizontal line extending to the right.

PATRICK J. CASTLE
Assistant United States Attorney